

# TERRENI

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March 6, 2013

The Honorable Jocelyn G. Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Response to email Correspondence of Ms. Linda Stevenson of January 19, 2013.

Dear Ms. Boyd:

Thank you for forwarding Ms. Linda Stevenson's email correspondence to the Commission of March 2, 2013. I would like to take this opportunity to respond to Ms. Stevenson's correspondence.

Ms. Stevenson ostensibly requested that the Commission order Tega Cay Water Service, Inc ("TCWS") to report on the cost of connecting the company's lines to the City of Tega Cay's sewer lines. Converting TCWS's system to a collection system which sends sewage to the City of Tega Cay collection system which is then pumped to the City of Rock Hill for treatment would be costly and would not eliminate the majority of the infrastructure of which Ms. Stevenson complains. The two main lift stations, No. 14 at WWTP 2 and No. 15 at WWTP 3, would have to be upgraded again to pump to the City's collection system and thousands of yards, if not miles, of open cut trenches would need to be dug to install the force mains from TCWS facilities to those of the City. In addition to recovering its investment with a reasonable rate of return for this work, TCWS would also have to charge its customers for collection service at currently approved rates as well as pass on whatever treatment rate the City of Tega Cay would choose to charge. Such an undertaking could divert scarce capital needed to fund prudent upgrades and improvements to the existing collection system.

However, TCWS infers from Ms. Stevenson's request that she may actually desire to have the City of Tega Cay take ownership and assume operation of TCWS's system. If that is the case, we respectfully suggest that Ms. Stevenson should direct her request to the City of Tega Cay to see if it is interested in purchasing TCWS's system. TCWS would entertain any reasonable offer to divest of the system in Tega Cay.

We would also like to update the Commission on the sanitary sewer overflow ("SSO") which occurred on February 26, 2013, referred to in Ms. Stevenson's correspondence. The SSO was caused by system inflow following a 2.5-inch rain event and a 2 foot rise in the water level of Lake Wylie. The volume of the SSO was determined to be less than 2,000 gallons. It is important to note that this SSO did not involve a raw sewage discharge as asserted by Ms.

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Stevenson, but nearly fully treated effluent from the ultraviolet disinfectant unit at Wastewater Treatment Plant No. 2.. We do not desire any SSOs; however, it is an important to emphasize this distinction.

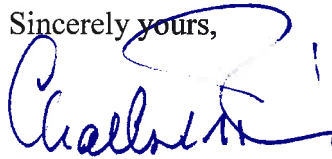
TCWS timely notified the South Carolina Department of Health and Environmental Control ("DHEC"), the City of Tega Cay, and the City of Rock Hill's water treatment plant, as required by its National Pollutant Discharge Elimination System ("NPDES") permit; notice was also sent to the Catawba Riverkeeper. TCWS posted "*No Swimming*" signs upon learning of the spill. Because the spill involved less than 5,000 gallons, no public notice was required by DHEC and no telephonic notice was issued. TCWS collected bacterial samples from the cove where the spill occurred and found no discernible increase in coliform bacteria. This is reflective of the fact that the spill occurred at the end of the treatment process.

On February 28, 2013, TCWS submitted a revised Corrective Action Plan ("CAP") to DHEC in response to an SSO that occurred on January 18, 2013. The CAP, prepared by the WK Dickson engineering firm at the request of TCWS, describes specific measures the company has agreed to undertake to identify and correct deficiencies in its collection system's reaction to heavy rain events such as the one experienced last month. A copy of the CAP is attached to this letter.

If the Commission desires more information regarding the subjects covered in this letter, please do not hesitate to let me know.

With best wishes, I am

Sincerely yours,



Charles L.A. Terreni

Enclosures (as stated)

c: Ms. Lisa Sparrow  
The Hon. Dukes Scott  
Jeffrey M. Nelson, Esquire  
Shannon Bowyer Hudson, Esquire  
Scott Elliott, Esquire  
John M.S. Hoefer, Esquire



February 28, 2013

Mr. Paul F. Wise  
South Carolina Department of Health and Environmental Control  
Water Pollution Enforcement Section  
Bureau of Water  
2600 Bull Street  
Columbia, South Carolina 29201

**RE: Consent Order 11-004-W  
Corrective Action Plan  
WWTF #2 NPDES Permit SC0026743  
WWTF #3 & #4 NPDES Permit SC0026751  
York County, South Carolina  
WKD No. 20110006.00.CA**

Dear Mr. Wise:

This Corrective Action Plan (CAP) is being submitted in response to Sanitary Sewer Overflows (SSOs) that occurred on January 18, 2013. On January 17 & 18, 2013 approximately two and one half (2.5) inches of rain fell in Tega Cay (data from United States Geological Survey Rain Station 350128081000145 CRN-38). Concurrent with the rainfall, the Catawba River, Lake Norman, Mountain Island Lake, and Lake Wylie rose significantly. Lake Wylie rose approximately two (2) feet over the period between January 16 and 18. This activity resulted in overflows at WWTP #2 and one (1) manhole directly upstream of the plant. Flow data indicates that the daily flow through WWTP #2 increased approximately five hundred thousand (500,000) gallons while flows at WWTP #3 increased approximately two hundred fifty thousand (250,000) gallons. There were no SSOs associated with the collection system draining to WWTP #3.

The rainfall event, changes in lake levels and the observed flow through the plants are events that are not indicative of infiltration but of inflow and therefore the CAP will focus on identifying inflow to the collection system. To date, Tega Cay Water Service and WK Dickson have collected data included rainfall data, lake levels of the primary lakes within the storm basin, information related to flood zones, topographical information of the development and gravity sewer system, flow data through the treatment plants, and run times of the pump stations within the collection system. This data has been compiled to better understand the events leading up to the overflows and to produce a CAP. It is believed that the higher lake level has a significant impact on the behavior of the collection system and why these occurrences were not observed in previous investigations. The CAP will include the following items:

1. Visual Inspections of manholes located within storm drainage flow ways and below elevations relative to the highest predicted level of the lake. See attached graph of Lake Wylie lake levels.

2. Smoke Tests of the Gravity Collection System in the areas draining to WWTP #2 beginning in the areas draining to lift stations # 2 and # 3. Smoke tests will identify cross connections with storm drains and leaks that would allow inflow as well as illicit connections.
3. Field crews will install manhole dish inserts as they investigate and find manholes that appear to be subject to inflow through the manhole cover. These can be left or replaced with water tight covers later.
4. Field crews will replace any missing Clean-out caps that may be identified during smoke testing.

Field work has been scheduled to begin the week of March 11, 2013 and will continue for a period of up to forty-five (45) days. After the completion of the field work, recommendations for repairs and a schedule for completion will be submitted to your office.

Should you have any questions or comments please feel free to give me a call to discuss further.

Sincerely,

**W.K. Dickson & Co., Inc.**



Kevin F. Strickland, PE  
Senior Project Manager

cc: Patrick Flynn, Southeast Regional Director, Utilities, Inc.  
David White, Project Manager, Utilities, Inc.  
Mac Mitchell, Regional Manager, Utilities, Inc. ✓

